## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MASSACHUSETTS BOSTON DIVISION

RANDY L. HANCOCK,  Plaintiff  v.  PRINCETON PROPERTIES MANAGEMENT, INC., d/b/a PRINCETON PROPERTIES APARTMENTS, CHRISTIAN H.  GARGUREVICH, and ROLAND FONG d/b/a  PRINCETON PROPERTIES APARTMENTS, CHRISTIAN H.  CARGUREVICH, and ROLAND FONG d/b/a  PROPERTIES APARTMENTS, CHRISTIAN H.  CARGUREVICH, and ROLAND FONG d/b/a	
Plaintiff ) v. ) PRINCETON PROPERTIES MANAGEMENT, ) C.A. NO.: 04-107811 INC., d/b/a PRINCETON PROPERTIES ) APARTMENTS, CHRISTIAN H. ) GARGUREVICH, and ROLAND FONG d/b/a )	
v. )  PRINCETON PROPERTIES MANAGEMENT, ) C.A. NO.: 04-107811 INC., d/b/a PRINCETON PROPERTIES ) APARTMENTS, CHRISTIAN H. ) GARGUREVICH, and ROLAND FONG d/b/a )	
PRINCETON PROPERTIES MANAGEMENT, ) C.A. NO.: 04-10781N INC., d/b/a PRINCETON PROPERTIES ) APARTMENTS, CHRISTIAN H. ) GARGUREVICH, and ROLAND FONG d/b/a )	
INC., d/b/a PRINCETON PROPERTIES  APARTMENTS, CHRISTIAN H.  GARGUREVICH, and ROLAND FONG d/b/a  )	
INC., d/b/a PRINCETON PROPERTIES  APARTMENTS, CHRISTIAN H.  GARGUREVICH, and ROLAND FONG d/b/a  )	
APARTMENTS, CHRISTIAN H. ) GARGUREVICH, and ROLAND FONG d/b/a )	MG
GARGUREVICH, and ROLAND FONG d/b/a )	
DOD I ANDIAGE	
R&R LAWN MAINTENANCE )	
AND LANDSCAPING, )	
Defendants )	
)	

## PLAINTIFF'S MOTION TO AMEND COMPLAINT PURSUANT TO FED. R. CIV. P. 15(a)

NOW comes the Plaintiff, by and through the undersigned counsel, and hereby moves this Honorable Court pursuant to Fed. R. Civ. P. 15(a) to amend his complaint to correct the name of R & R Lawn Maintenance and Landscaping, to add Greatscapes of Nashua, Inc. as a party defendant and to add counts against the Defendant, Princeton Properties Management, Inc. alleging breach of implied warranty of habitability and breach of covenant of quiet enjoyment. The Plaintiff submits the annexed memoranda of law in support of this motion. A copy of Plaintiff's Second Amended Complaint and Jury Claim is also annexed hereto.

The Plaintiff,
By his Attorne

Mark S. Shuman

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